REMARKS

The Examiner's action of July 13, 2004 is noted in which Claims 1-11 and 13 are finally rejected under 35 USC 102 over the Janky reference and in which Claims 12 and 14 are rejected under 35 USC 103 as being unpatentable over Janky and further Janky plus Rodal et al.

The Janky reference is one that interfaces a GPS module to a phone and this is admitted. What is not admitted is that a system is shown to take a fixed format from one module, namely the GPS module, and transform it into the fixed format of the phone.

The fact that Janky recognizes that there are different formats does not mean that it teaches a system that does anything about it.

There is no question that if one knows ahead of time the format of the phone that one wants to use, one could design the I/O of the GPS module to match it. This requires pre-knowledge of the format acceptable to the phone.

However, the Examiner should be made aware that even within a model year, different models of a manufacturer's phone have widely varying bus structures and varying code requirements.

In point of fact, the reason that the inventor came up with the subject invention is his company's inability to redesign the coding for each and every phone model for each and every manufacturer, for each and every year. This prevented a production run in which one could have a universal GPS module that could interface universally to all phones.

What to do? It became apparent that the inventor's company could not dictate to the phone manufacturers what bus structure to use.

Likewise it became apparent to the inventor's company that it could not retool each and every module for the different bus structures.

In any given year with, for instance, five major phone manufacturers each having at least three different bus structures for the various models, one could not contemplate retooling the GPS module for 15 different phones.

Rather it seemed possible to be able to interpose an easily reconfigurable compiler between the GPS module and the phone to reconfigure it.

If anything, Janky teaches away from the subject invention because he teaches that he must design the I/O of the GPS module for whatever phone bus structure he wants to attach it to. Janky in no way is designing a universal system for configuring a GPS module to any phone, but rather designing for a specific phone.

In point of fact, he knows what phone he wants to design to because he specifically configures the packaging of the module to match that of the phone.

On the other hand, with the subject invention, one would not perform this physical or electrical matching ahead of time.

Thus what the claimed invention accomplishes is the ability to take two intransigent communications systems that are not to be touched and interfaces them in such a way that one can couple the GPS module to any phone by merely reconfiguring a compiler.

Note that a UART, as mentioned before, is not programmable and cannot function as a compiler.

Janky does not teach reconfiguring anything. He apparently is not worried about adapting to multiple phones. This is the problem solved by the claimed invention.

Thus it is Applicant's contention that the claimed invention is not shown or taught in Janky in that Janky only recognizes the problem presented by the wide variety of phone formats but fails to provide a solution.

Claims 12 and 14 that are rejected under 35 USC 103 in view of Janky in combination with Rodal et al. will also not lie. This is because Janky does not teach the solution to the problem of multiple phone formats.

In view of this Amendment, allowance of the claims and issuance of the case is earnestly solicited. Alternatively, entry of this Amendment for purposes of Appeal is requested.

Respectfully submitted,

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